

Exhibit B

MARTINEZ V. COUNTY OF ALAMEDA ET AL.: JOINT EXHIBIT LIST

Number/ Letter	Description	Purpose/Witness	Objections	Response to Objection	Admitted/ Court Notes
1	Title II Elements and Jury Charge Demonstrative Chart(s)	Explanation of the Title II Effective Communication Requirement; Eve Hill	<p>Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is, Defendant objects as follows:</p> <p>FRE 401, 402, 403, 602, 701, 802</p>	<p>This exhibit will set forth the elements of the effective communication requirement and will accurately summarize the key legal requirements from voluminous regulatory guidance. It is offered by a qualified expert, and is admissible under FRE 1006, 611, as non-testimonial evidence, and/or through hearsay exceptions set forth in FRE 807.</p>	
2	Excerpts from the Code of Federal Regulations	Explanation of the Title II Effective Communication Requirement; Admissibility through Request for Judicial Notice/Stipulation. See Defense Exhibit R.	<p>Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is, Defendant objects as follows:</p>	<p>The Code of Federal Regulations is directly relevant to the matter at hand and is admissible evidence. It is non-hearsay, if it were hearsay, it would be subject to the exemption in FRE 803(8), (6), and/or (18). No expert testimony is implicated.</p>	

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			FRE 401, 402, 403, 602, 701, 802		
3	DOJ Guidance – Briones Dep. Ex. B1 and all sources referenced therein	Explanation of the Title II Effective Communication Requirement; Admissibility through Request for Judicial Notice/Stipulation. See Defense Exhibits R, U, V.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is, Defendant objects as follows: FRE 401, 402, 403, 602, 701, 802	DOJ Guidance is directly relevant to the matter at hand and is admissible evidence. It is non-hearsay, if it were hearsay, it would be subject to the exemption in FRE 803(8), (6), and/or (18). No expert testimony is implicated.	
4	DOJ Publication – ADA Requirements – Effective Communication, https://www.ada.gov/resources/effective-communication/	Explanation of the Title II Effective Communication Requirement; Admissibility through Request for Judicial Notice/Stipulation. See Defense Exhibit T.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is, Defendant objects as follows: FRE 401, 402, 403, 602, 701, 802	DOJ publications are directly relevant to the matter at hand and is admissible evidence. It is non-hearsay, if it were hearsay, it would be subject to the exemption in FRE 803(8), (6), and/or (18). No expert testimony is implicated.	

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5	OJ ADA Title II Technical Assistance Manual, Equally effective communication and Primary consideration § II-7.1000-1100, https://archive.ada.gov/taman2.html#II-7.1000	Explanation of the Title II Effective Communication Requirement; Admissibility through Request for Judicial Notice/Stipulation. See Defense Exhibit W.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is, Defendant objects as follows: FRE 401, 402, 403, 602, 701, 802	DOJ technical assistance manuals are directly relevant to the matter at hand and is admissible evidence. It is non-hearsay, if it were hearsay, it would be subject to the exemption in FRE 803(8), (6), and/or (18). No expert testimony is implicated.	
6	Demonstrative Photographs of the CRO Public Waiting Area, PL1573, PL1583	Layout of the office; Steven Clark.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question.		
7	Plaintiff's Initial Completed FBN Form – Briones Dep. Ex. M2, PL0009	Demonstration of ineffective communication. Deposition or live testimony of Maria Laura Briones/Stipulation.			
8	Be Confident Be You Articles of Incorporation – PL0007-8	Demonstration of ineffective communication. Testimony of Plaintiff.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question.	Defendant was provided a copy in discovery at PL007-8. This document is highly relevant as it demonstrates the lack of effective	

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			Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is, Defendant objects as follows: FRE 401, 402, 403, 602, 701, 802	communication on the initial attempt to file the FBN and provides explanation of the communications challenges. It is not offered for the truth of the statements contained therein and is subject to hearsay exemptions under FRE 803(5) and 803(6). Expert testimony is not implicated.	
9	Go Back Letter – Briones Dep. Ex. M1, County_0012	Demonstration of ineffective communication. Deposition or live testimony of Maria Laura Briones/Stipulation.			
10	Final Filed FBN – Briones Dep. Ex. M4, County_0011	Demonstration of ineffective communication. Deposition or live testimony of Maria Laura Briones/Stipulation.			
11	Letter to Ziegler & Welk at the County of Alameda re Structured Negotiations (11/14/19), County_001-010	Demonstration of Notice. Testimony of Plaintiff or Matt Yankee/Stipulation.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is,	Defendant has produced this document in discovery. It is not offered for the truth of the statements, but to show effect on the party receiving the statements (notice). It is relevant to deliberate	

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			Defendant objects as follows: FRE 401, 402, 403, 602, 701, 802	indifference/notice. Expert testimony is not implicated.	
12	Martinez family mementos	Demonstration of Plaintiff's ability to communicate effectively, demonstration ineffective communication is by way of disability and damages. Testimony of Plaintiff.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is, Defendant objects as follows: FRE 401, 402, 403, 602, 701, 802	Plaintiff will offer limited evidence of her ability to communicate effectively to show that her difficulties at the CRO were caused by a lack of auxiliary aids and services not her disability caused the communications failures. The evidence will allow Plaintiff to demonstrate the damages she suffered.	
13	Photographs/promotional materials from Be Confident Be You™	Demonstration of Plaintiff's independence and damages. Testimony of Plaintiff.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is,	The evidence will allow Plaintiff to demonstrate the damages she suffered and the importance/value of the services she provides, as well as the cost of being unable to work. Plaintiff will offer testimony/be	

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			Defendant objects as follows: FRE 401, 402, 403, 602, 701, 802	available for examination regarding the truth of the statements therein. Expert testimony is not required to show the reasonable value of Plaintiff's time.	
14	Audio recordings and/or transcripts of the incident in question – PL0001, PL0003, PL0005	Demonstration of ineffective communication.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is, Defendant objects as follows: As to the transcripts, FRE 401, 402, 403, 802	If transcripts are introduced, they will comply with FRE 80, or another procedure by stipulation of the Parties (such as prior certification by a stenographic recorder not present in Court).	
15	Plaintiff's Claim Against the County of Alameda – Yankee 30(b)(6) Dep. Ex. Y1, PL0014-16	Demonstration of Notice. Testimony of Plaintiff or Matt Yankee/Stipulation. See Defense Exhibit A.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding	This document was introduced as an exhibit to the testimony of Matt Yankee. It is relevant to show notice and is not offered for the truth of the matter. If it were offered for the	

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			of what this exhibit likely is, Defendant objects as follows: FRE 401, 402, 403, 602, 701, 802	truth of the matter, it would be subject to multiple hearsay exceptions including 803(6) and 803(8). Expert testimony is not implicated.	
16	Acknowledgement of Plaintiff's Claim – Yankee 30(b)(6) Dep. Ex. AC3	Demonstration of Notice. Testimony of Matt Yankee/Stipulation.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is, Defendant objects as follows: FRE 401, 402, 403, 602, 701, 802	This document was introduced as an exhibit to the testimony of Matt Yankee. It is relevant to show notice and is not offered for the truth of the matter. If it were offered for the truth of the matter, it would be subject to multiple hearsay exceptions including 803(6) and 803(8). Expert testimony is not implicated.	
17	May I Help You? Legal Advice vs. Legal Information: A Resource Guide for Court Clerks” (California Judicial Council Access and Fairness Advisory Committee), https://www.courts.ca.gov/documents/ma	Requested auxiliary aid was equally effective, reasonable, and not an undue burden/fundamental alteration. Testimony of Plaintiff, Steven Clark, Karen McCall, or Eve Hill.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is,	The practices of other entities are admissible to demonstrate the range of available auxiliary aids and services, including what Defendant terms “scribe” services. It is non-hearsay admissible	

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	yihelpyou.pdf, PL0047-PL0058		Defendant objects as follows: FRE 401, 402, 403, 602, 701, 802	under Rule 902, or in the alternative falls with a hearsay exception in FRE 803(6), 803(8) or 807.	
18	“Can the court system help me fill out a form as an accommodation,” NY COURTS.GOV Accessibility General FAQ’s, https://ww2.nycourts.gov/Accessibility/faqs.shtml , PL0059-PL0066	Requested auxiliary aid was equally effective, reasonable, and not an undue burden/fundamental alteration. Testimony of Plaintiff, Steven Clark, Karen McCall, or Eve Hill.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant’s understanding of what this exhibit likely is, Defendant objects as follows: FRE 401, 402, 403, 602, 701, 802	The practices of other entities are admissible to demonstrate the range of available auxiliary aids and services, including what Defendant terms “scribe” services. It is non-hearsay admissible under Rule 902, or in the alternative falls with a hearsay exception in FRE 803(6), 803(8) or 807.	
19	“How to ask for a court accommodation under the Americans with Disabilities Act,” Mass.gov, https://www.mass.gov/info-details/how-to-ask-for-a-court-accommodation-under-the-americans-with-	Request for auxiliary aid or service was properly made. Testimony of Plaintiff, Steven Clark, Karen McCall, or Eve Hill.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant’s understanding of what this exhibit likely is,	The practices of other entities are admissible to demonstrate the adequacy of Ms. Martinez’s request, the range of available auxiliary aids and services, including what Defendant terms “scribe” services. It	

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	disabilities-act, PL0067-PL0070		Defendant objects as follows: FRE 401, 402, 403, 602, 701, 802	is non-hearsay admissible under Rule 902, or in the alternative falls within a hearsay exception in FRE 803(6), 803(8) or 807	
20	Fictitious Business Name PDF dated 10/18 – McCall Report, Ex. 1, PL1547	Demonstration of ineffective communication and continuing need for injunctive relief. Testimony of Karen McCall, County Witnesses/Stipulation.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is, Defendant objects as follows: FRE 401, 402, 403, 602, 701, 802	Defendant has been provided a copy of this report in Plaintiff's expert disclosures. It is relevant to show the accessibility features of the PDF form the County claims was accessible. The document is admissible pursuant to FRE 902, or in the alternative, falls within an exception set forth in FRE 803.	
21	Fictitious Business Name PDF dated 4/21 – McCall Report, Ex. 2, PL1549	Demonstration of ineffective communication and continuing need for injunctive relief. Testimony of Karen McCall, County Witnesses/Stipulation.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is,	Defendant has been provided a copy of this report in Plaintiff's expert disclosures. It is relevant to show the accessibility features of the PDF form the County claims was accessible. The document is admissible pursuant	

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			Defendant objects as follows: FRE 401, 402, 403, 602, 701, 802	to FRE 902, or in the alternative, falls within an exception set forth in FRE 803.	
22	Fictitious Business Name PDF dated 11/22 – McCall Report, Ex. 3, PL1551	Demonstration of ineffective communication and continuing need for injunctive relief. Testimony of Karen McCall, County Witnesses/Stipulation.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is, Defendant objects as follows: FRE 401, 402, 403, 602, 701, 802	Defendant has been provided a copy of this report in Plaintiff's expert disclosures. It is relevant to show the accessibility features of the PDF form the County claims was accessible. The document is admissible pursuant to FRE 902, or in the alternative, falls within an exception set forth in FRE 803.	
23	Fictitious Business Name PDF dated 12/22 –McCall Report, Ex. 4, PL1553	Demonstration of ineffective communication and continuing need for injunctive relief. Testimony of Karen McCall, County Witnesses/Stipulation.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is, Defendant objects as follows:	Defendant has been provided a copy of this report in Plaintiff's expert disclosures. It is relevant to show the accessibility features of the PDF form the County claims was accessible. The document is admissible pursuant to FRE 902, or in the alternative, falls	

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			FRE 401, 402, 403, 602, 701, 802	within an exception set forth in FRE 803.	
24	Graphic figures from 10/02/23 expert report of Steven Clark, PL_EXPERT 0046-51	Demonstration of ineffective communication and continuing need for injunctive relief. Testimony of Steven Clark.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is, Defendant objects as follows: FRE 401, 402, 403, 602, 701, 802	Defendant has been provided a copy of this report in Plaintiff's expert disclosures. It is relevant to show the accessibility features of the PDF form the County claims was accessible. The document is admissible pursuant to FRE 902, or in the alternative, falls within an exception set forth in FRE 803.	
25	Demonstrative \$100 bill	Damages. Testimony of Plaintiff, Joseph Bakker or Emily Grimm.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is, Defendant objects as follows: FRE 401, 402, 403, 602, 701, 802	This proposed exhibit is offered as demonstrative evidence only.	

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26	Demonstrative clock timer	Damages. Testimony of Plaintiff, Joseph Bakker or Emily Grimm.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is, Defendant objects as follows: FRE 401, 402, 403, 602, 701, 802	This proposed exhibit is offered as demonstrative evidence only.	
27	Demonstrative ink pen	Damages. Testimony of Plaintiff, Joseph Bakker or Emily Grimm.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is, Defendant objects as follows: FRE 401, 402, 403, 602, 701, 802	This proposed exhibit is offered as demonstrative evidence only.	
28	Demonstrative Kleenex package	Damages. Testimony of Plaintiff, Joseph Bakker or Emily Grimm.	Defendant has not yet been provided a copy of the proposed exhibit and does	This proposed exhibit is offered as	

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			<p>not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is, Defendant objects as follows:</p> <p>FRE 401, 402, 403, 602, 701, 802</p>	<p>demonstrative evidence only.</p>	
29	<p>Memorandum with JAWS instructions sent to Clerks describing the process of accommodating a blind applicant who cannot use JAWS, County_0121-23</p>	<p>Demonstration of Notice. Testimony of Jocelyn Cole, Matt Yankee/Stipulation. See Defense Exhibit M.</p>	<p>Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is, Defendant objects as follows:</p> <p>FRE 401, 402, 403, 602, 701, 802</p>	<p>Defendant created this memorandum and produced it in discovery. However, to the extent Defendant contends it is inadmissible, and will not offer the same, Plaintiff withdraws the exhibit.</p>	
30	<p>County Budgets – PL0071-0584, PL0585-1056, PL1057-1546</p>	<p>Demonstration of Receipt of Funds. Testimony of Matt Yankee/Stipulation. See Defense Exhibit Z.</p>	<p>Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the</p>	<p>Defendant was provided a copy of this document in discovery. It is relevant to Defendant's</p>	

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			<p>documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is, Defendant objects as follows:</p> <p>FRE 401, 402, 403, 602, 701, 802</p>	<p>arguments regarding the receipt of state and federal funds. It is admissible under FRE 902 and/or 803(6) and/or (8).</p>	
31	<p>California Government Code 2720 – Yankee 30(b)(6) Dep. Ex. AC5</p>	<p>Examination of Undue Burden Defense. Testimony of Matt Yankee.</p>	<p>Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is, Defendant objects as follows:</p> <p>FRE 401, 402, 403, 602, 701, 802</p>	<p>Although the Court may take note of legislative facts at its discretion and “[j]udicial notice . . . is unnecessary,” <i>Von Saher v. Norton Simon Museum of Art at Pasadena</i>, 592 F.3d 954, 960 (9th Cir. 2010). Such statements are non-hearsay. To the extent Defendant contends the evidence should be excluded pursuant to FRE 401, 402, or 403, Plaintiff withdraws the exhibit, as long as Defendant agrees not to introduce the same.</p>	

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32	Defendants' Discovery Responses	See specific discovery citations/objections on Appendix, p. 8-10.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is, Defendant objects as follows: FRE 401, 402, 403, 602, 802	The Joint Appendix does list the discovery responses specifically in question, and Plaintiff reserves the right to respond to each.	
33	Defendants' Initial Disclosures	See specific discovery citations/objections on Appendix, p. 8-10.	Defendant has not yet been provided a copy of the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Without waiving other objections and based upon Defendant's understanding of what this exhibit likely is, Defendant objects as follows: FRE 401, 402, 403, 602, 802	The Joint Appendix does list the discovery responses specifically in question, and Plaintiff reserves the right to respond to each.	
A (D1)	Plaintiff's November 14, 2019, Demand		Plaintiff has not reviewed the proposed exhibit and does not waive any potential		

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	Letter/Claim to the County		objections to the usage or modification of the documents in question. Notwithstanding, Plaintiff understands this exhibit to be substantively the same as Exhibits 11 &15 and may stipulate to its admissibility.		
B (D2)	Alameda County Auditor-Controller Agency Employee Information Handbook		Fed. R. Evid. 401; 402; 403.		
C (D3)	Fictitious Business Name Statement that Plaintiff attempted to file in the CRO on March 29, 2019		Plaintiff understands this exhibit to be substantively the same as Exhibit 7 and may stipulate to its admissibility.		
D (D4)	Plaintiff's Responses to Eva He's Interrogatories, Set One		Plaintiff is unable to raise all objections in this format, but anticipates raising objections pursuant to Fed. R. Evid. 401, 402, 403, 701, 702, 801, among others.		
E (D5)	Plaintiff's Responses to Eva He's Requests for Admissions, Set One		Plaintiff is unable to raise all objections in this format, but anticipates raising objections pursuant to Fed. R. Evid. 401, 402, 403, 701, 702, among others.		
F (D6)	March 29, 2019, "Go Back Letter" prepared for and provided to Plaintiff		Plaintiff understands this exhibit to be substantively the same as Exhibit 9 and may stipulate to its admissibility.		

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	by Maria Laura Briones				
G (D7)	Plaintiff's first audio recording from her March 29, 2019, visit to the CRO		Plaintiff understands this exhibit to be substantively the same as Exhibit 14 and may stipulate to its admissibility, subject to Plaintiff's objection to cumulative playing as set forth in the Motion in Limine.		
H (D8)	Plaintiff's second audio recording from her March 29, 2019, visit to the CRO		Plaintiff understands this exhibit to be substantively the same as Exhibit 14 and may stipulate to its admissibility, subject to Plaintiff's objection to cumulative playing as set forth in the Motion in Limine.		
I (D9)	Plaintiff's third audio recording from her March 29, 2019, visit to the CRO		Plaintiff understands this exhibit to be substantively the same as Exhibit 14 and may stipulate to its admissibility, subject to Plaintiff's objection to cumulative playing as set forth in the Motion in Limine.		
J (D10)	Fictitious Business Name Statement that Plaintiff filed in the CRO on May 31, 2019		Plaintiff understands this exhibit to be substantively the same as Exhibit 10 and may stipulate to its admissibility.		

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K (D11)	Articles of Organization regarding Plaintiff's company, Be Confident Be You Coaching LLC		Plaintiff understands this exhibit to be substantively the same as Exhibit 8 and may stipulate to its admissibility.		
L (D12)	March 29, 2019, Text Message from Jocelyn Cole to Matt Yankee		Fed. R. Evid. 402, 403, 701, 801, and hearsay-within-hearsay.		
M (D13)	JAWS Screen Reader Software Instructions and General Guidelines for CRO employees to assist persons with a vision disabilities in completing an FBNS using the CRO's kiosk		Defendant has not stated the purpose for which this exhibit will be offered. Accordingly, Plaintiff asserts objections based on Fed. R. Evid. 402, 403, and 801. Plaintiff also refers to the Motion in Limine regarding subsequent remedial measures. Plaintiff reserves the right to further object.		
N (D14)	Email string from CRO employee, Jocelyn Cole, to all CRO employees, with emails dated August 28, 2023 and July 18, 2023, regarding assisting people with vision disabilities in completing an FBNS using the CRO's computer kiosk, and attaching the		Plaintiff has not had the opportunity to review the proposed exhibit. Defendant has not stated the purpose for which this exhibit will be offered. Accordingly, Plaintiff asserts objections based on Fed. R. Evid. 402, 403, 701, 702, and 801. Plaintiff also refers to the Motion in Limine regarding subsequent remedial measures. Plaintiff reserves the right to further object.		

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	document listed above as Exhibit 13				
O (D15)	ADA Title II – 42 U.S.C. section 12132 – elements/jury charge demonstrative chart		Plaintiff has not reviewed the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Notwithstanding, Plaintiff understands this exhibit to be substantively the same as Exhibits 11 &15 and may stipulate to its admissibility.		
P (D16)	Cal. Civ. Code section 11135 – elements/jury charge demonstrative chart		Plaintiff has not reviewed the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Defendant has not stated the purpose of this exhibit or who will offer it. Accordingly, Plaintiff asserts objections based on Fed. R. Evid. 402, 403, 701, 702, and 801. Plaintiff reserves the right to further object. Plaintiff also refers to the proposed jury charges regarding the elements of Cal. Gov. Code 11135.		
Q (D17)	Cal. Civ. Code sections 54-55.3 – elements/jury charge demonstrative chart		Plaintiff has not reviewed the proposed exhibit and does not waive any potential objections to		

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			<p>the usage or modification of the documents in question. Defendant has not stated the purpose of this exhibit or who will offer it. Accordingly, Plaintiff asserts objections based on Fed. R. Evid. 402, 403, 701, 702, and 801. Plaintiff reserves the right to further object. Plaintiff also refers to the proposed jury charges.</p>		
R (D16*)	Excerpts from the Code of Federal Regulations – 28 C.F.R. sections 35.104, 35.130, and 35.160, and Appendix A to Part 35		<p>Plaintiff has not reviewed the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Notwithstanding, Plaintiff understands this exhibit to be substantively similar to Exhibit 2 and may stipulate to its admissibility.</p>		
S (D17*)	Excerpts from Cal. Government Code – Cal. Government Code section 27203		<p>Fed. R. Evid. 402, 403, as Defendant has not shown the existence of a writing pursuant to 28 C.F.R. 35.164.</p>		
T (D18*)	DOJ Publication – ADA Requirements – Effective Communication		<p>Plaintiff has not reviewed the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Notwithstanding, Plaintiff</p>		

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			understands this exhibit to be substantively the same as Exhibit 4 and may stipulate to its admissibility.		
U (D19*)	DOJ Publication – ADA – Tool Kit of Best Practices		Plaintiff has not reviewed the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Notwithstanding, Plaintiff understands this exhibit to be a current department of justice publication and may stipulate to its admissibility.		
V (D20*)	DOJ Publication – ADA – Title II Primer		Plaintiff has not reviewed the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Notwithstanding, Plaintiff understands this exhibit to be a current department of justice publication and may stipulate to its admissibility.		
W (D21*)	DOJ Publication – ADA – Title II Technical Assistance Manual		Plaintiff has not reviewed the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Notwithstanding, Plaintiff understands this exhibit to be substantively the same as		

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			Exhibit 4 and may stipulate to its admissibility.		
X (D22*)	Videos of Plaintiff's counsel and expert witness using the CRO's kiosk to complete an FBNS electronically in August 2023		<p>Plaintiff objects to untimely disclosure and requests pursuant to Fed. R. Civ. Proc. 37(c)(1) and 16(f). Plaintiff further objects pursuant to Fed. R. Evid. 401, 402, 403. During a meet and confer over Plaintiff's proposed Motion in Limine regarding rule 407, Plaintiff learned that Defendant does not plan to offer this exhibit to the jury or put it in their affirmative case. While this may eliminate the need for the motion notwithstanding the presence of the exhibit on this list, Plaintiff maintains any other objections for the use of this exhibit on rebuttal or for other purposes.</p> <p>Plaintiff objects to the incomplete/selected nature of the video production pursuant to Fed. R. Evid. 403, and 106. Defendant has not stated the purpose of the video or offering party and plaintiff therefore objects pursuant to Fed. R. Evid. 901 and 801.</p>		

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Y (D23*)	Expert Report of Cris Vaughan and Attachment A thereto		Fed. R. Evid. 801; hearsay. See also, Plaintiff's Motion to Exclude Expert Testimony.		
Z (D24*)	County Final Budgets – 2018/2019 and 2019/2020		Plaintiff has not reviewed the proposed exhibit and does not waive any potential objections to the usage or modification of the documents in question. Notwithstanding, Plaintiff understands this exhibit to be substantively similar to Exhibit 30 and may stipulate to its admissibility.		